MISSOURI DEPARTMENT OF NATURAL RESOURCES AIR AND LAND PROTECTION DIVISION ENVIRONMENTAL SERVICES PROGRAM Standard Operating Procedures

SOP #: MDNR-FSS-301		EFFECTIVE DATE: September 28, 2001						
SOP TITLE: <u>Preparation of I</u>	Hazardous Waste	e Manifest Docur	nents					
WRITTEN BY: Eric Sapping	gton, Environme	ntal Specialist IV	, Field Service	s Section, ESP				
APPROVED BY: Earl Pabst	, Director, ESP	-						
SUMMARY OF REVISIONS	5: The 1994 vers	sion of this SOP	was adapted to	fit the new SOP				
		format. Many changes in wording were made to clarify and						
	update the pro			•				
APPLICABILITY:		The procedures established in this SOP apply to all ESP staff						
			mpleting or rev	viewing hazardous				
	waste manifes	st documents.						
DISTRIBUTION:		MoDNR Intranet						
	ESP FSS Sect							
	ESP EERS Se							
	ESP FSS SOF	P Coordinator						
RECERTIFICATION RECOI	RD:							
Date Reviewed								
Initials								

1.0 SCOPE AND APPLICABILITY

This Standard Operating Procedure (SOP) provides guidance for Environmental Services Program (ESP) personnel who must either complete or review hazardous waste manifest documents. A hazardous waste manifest document, or simply a manifest, is a multicopy form that is required any time hazardous waste is shipped or transported. The ESP, which includes the state environmental laboratory, is a hazardous waste generator primarily as a result of analytical processes. Several times each year, the ESP ships hazardous waste from its laboratory to a permitted treatment, storage, and disposal (TSD) facility for proper disposal. In addition, through its Environmental Emergency Response functions the ESP may assume generator status of abandoned hazardous wastes and may need to initiate a shipment of hazardous waste from an off-site location to a permitted TSD facility. All ESP personnel who must complete a manifest to accompany a shipment of hazardous waste shall follow the procedures specified in this SOP.

The ESP is not licensed to transport hazardous waste. Therefore, except under certain emergency conditions, a licensed and qualified contractor will be used any time the ESP needs to transport hazardous waste either from the laboratory facility or from an off-site location. Hazardous waste contractor services usually include completion of all necessary shipping paperwork, including the manifest. However, ESP personnel should be aware that the generator is ultimately held responsible for the content of a manifest, not the contractor who may be filling it out. Hence, it is important for ESP personnel to thoroughly review any manifests that a contractor has completed for them. The procedures specified in this SOP will assist in reviewing completed manifests.

2.0 PROCEDURE

Many states, including Missouri, have produced their own versions of a manifest form. The department's Hazardous Waste Program (HWP) is responsible for producing the Missouri manifest. If the state to which the waste is being shipped (i.e. the location of the TSD facility) has produced its own manifest, then that state's form should be used when shipping hazardous waste. If the state to which the waste is being shipped does not have its own manifest form, then the Missouri form should be used. It is important to note that if another state's manifest form is used, Missouri regulations dictate that all information that is required for the Missouri manifest must be entered on the other state's document, regardless of whether or not there is a specific place to enter the information. For example, the state of Illinois manifest form does not have specific fields for entry of the Missouri manifest document number or the Missouri transporter's ID number – both of which are required on a Missouri manifest. Therefore, those numbers would have to be entered somewhere else on the Illinois manifest under "additional description" or other space that may be available.

The Missouri manifest has six pages or "parts". The front page is labeled part 1. Parts 2 through 6 are carbon copies of part 1. An example of the Missouri manifest part 1 has been filled out and attached to this SOP. Most of the information presented in the example is

factual and specific to the ESP, including generator ID numbers. NOTE: <u>The use of the ESP ID numbers by anyone other than ESP staff would be fraudulent.</u>

Each Missouri manifest comes with a detailed set of instructions that explain how to complete the form. The form has two main sections, a federal section (items 1 through 20) and a state section (items A through K). This SOP provides information supplemental to the Missouri manifest set of instructions. Not every item or block on the Missouri manifest is discussed in this SOP since many are self-explanatory and should require no further explanation.

At the time this SOP was written, the current Missouri manifest form was Revision 1-99 (January, 1999). When completing or reviewing a Missouri manifest, staff should check to make sure that they have the most up-to-date revision available from the HWP.

2.1 Federal Section

2.1.1 Item 1 - Generator's US EPA ID No. and Manifest Document No.

The unique US EPA generator ID number assigned to the ESP facility located in Jefferson City is MOT300010964. This ID number must only be used for shipping hazardous waste from the ESP Jefferson City location. If the ESP Environmental Emergency Response Section should assume generator status at an off-site location (e.g. emergency response at an abandoned drum site) and need to transport hazardous waste to a TSD facility under manifest, then a unique temporary US EPA ID number will be required. The ID can be obtained by calling the HWP and making a request.

The Manifest Document number is a five-digit number which directly corresponds to the shipment number, and increases by 1 with each consecutive hazardous waste shipment which leaves the ESP. The shipment number is recorded and tracked in the ESP Hazardous Waste Files in file number 4024 – Hazardous Waste Disposal ESP.

2.1.2 Item 3 - Generator's Name and Mailing Address

For all manifests where the ESP is the generator, regardless of whether the shipment is originating from the ESP Jefferson City location or an off-site location, the name and mailing address should be listed as:

Missouri Department of Natural Resources
Environmental Services Program
P.O. Box 176
Jefferson City, MO 65102
Attn:

The ESP staff member who signs the manifest or is otherwise responsible for the shipment should include their name with the mailing address so when the final manifest is returned from the TSD facility to the ESP it will be brought to the attention of the responsible staff member.

2.1.3 Item 4 - Generator's Phone

For all ESP shipments, the 24-hour EER phone number (573) 634-2436 should be listed in the event of an emergency involving the shipment.

2.1.4 Item 5 – Transporter 1 Company Name

The name of the company that is transporting the waste must be entered here.

2.1.5 Item 6 – US EPA ID Number

The unique US EPA ID number that has been assigned to the transporter must be entered here. ESP staff should always ask the driver to produce a copy of their Missouri Hazardous Waste Transporter License Certificate to ensure that the US EPA ID number listed on the manifest is correct and that the certificate is current. The HWP issues Hazardous Waste Transporter License Certificates that are valid for periods of one year. If the transporter does not have a valid Hazardous Waste Transporter License Certificate, then the shipment should not be allowed to leave the ESP until the issue can be resolved.

2.1.6 Items 7 and 8 – Transporter 2 Company Name and US EPA ID Number

If the shipment will be transferred to another company somewhere in route to the designated facility (TSD facility), then the company name and ID number of the second transporter must be entered here. Sometimes this information is available when the hazardous waste is first picked up from the generator, other times it is not known but will be completed by the transporter at a later date.

2.1.7 Items 9 and 10 – Designated Facility and US EPA ID Number

The company name, physical address, and US EPA ID number must be listed here for the facility that will be receiving the hazardous waste for treatment or disposal.

2.1.8 Item 11 - US DOT Description

Each type of hazardous waste must be listed and described using US Department of Transportation protocol as described in 49 CFR 171 through 177. The required information can be located in the US DOT Hazardous Materials Table (49 CFR 172.101). The manifest requires listing the Proper

Shipping Name (column 2 in the Hazardous Materials Table), the Hazard Class (column 3), the ID number (column 4), and the Packing Group (column 5).

2.1.9 Item 12 – Containers, Number and Type

For each type of waste listed for Item 11, the number and type of containers must be entered here. The Missouri manifest instructions include a table that provides abbreviations for several different types of containers.

2.1.10 Items 13 and 14 – Total Quantity and Unit Wt/Vol

The quantity and unit weight or volume must be entered here. The Missouri manifest instructions include a table that provides abbreviations for units of measure (Item 14). For example, if there were two 55-gallon drums of similar waste entered on the same line in Item 12 and each drum weighed 500 pounds, then the entry for Item 13 (total quantity) would be 1,000 and the entry for Item 14 would be P (for pounds). NOTE: If the unit of measure used is a volume (i.e. gallons, liters, cubic yards, or cubic meters) rather than a weight (e.g. pounds), then the specific gravity must be entered under Item J. The reason is that hazardous waste is tracked by regulatory agencies primarily by weight and not by volume.

2.1.11 Item 16 – Generator's Certification

This is where the ESP staff member must print and sign their name, certifying with their signature that everything on the manifest is correct.

2.1.12 Items 17 through 20

These items are specifically for the transporter(s) and the designated (TSD) facility. NOTE: The transporter who is accepting the waste from the ESP must sign Item 17 and provide a copy to the ESP prior to leaving the site.

2.2 State Section (shaded areas on the Missouri manifest form)

2.2.1 Item A – Missouri Manifest Document Number

The first six spaces under Item A are for entering the unique Missouri generator ID number assigned to the ESP facility in Jefferson City. That unique ID number is 002121. Like the unique US EPA generator ID number, the Missouri generator ID number must only be used when shipping hazardous waste from the ESP Jefferson City location. If the ESP Environmental Emergency Response Section should assume generator status at an off-site location (e.g. emergency response at an abandoned drum site) and need to transport hazardous waste to a TSD facility under manifest, then a unique

temporary Missouri ID number will be required. The ID can be obtained by calling the HWP and making a request.

The last four spaces under Item A are for the shipment number. The shipment number begins with 0001 and increases by 1 with each consecutive hazardous waste shipment that leaves the ESP (or a temporary site, if applicable). The shipment number is recorded and tracked in the ESP Hazardous Waste Files in file number 4024 – Hazardous Waste Disposal ESP (subfile entitled Hazardous Waste Shipment Log).

2.2.2 Item B – General Site Address

The physical address of the site (street, city, and state) where the hazardous waste is being picked up must be entered here.

2.2.3 Item C – MO Transporter's ID

This space is for entering the transporter's Missouri Hazardous Waste Transporter License Certificate number that has been issued by the MDNR, HWP. The certificate should be checked to ensure that it is valid. Missouri Hazardous Waste Transporter License Certificates are issued for periods of one year. The state of registration and license plate number of the waste-carrying portion of the vehicle (e.g. enter the trailer's plate if a tractor-trailer is used to transport the waste) must also be entered in this space.

2.2.4 Item E – MO Transporter's ID (Transporter 2)

If a second transporter company is used, then that company's Missouri Hazardous Waste Transporter License Certificate number must be entered here. Sometimes this information is available when the hazardous waste is first picked up from the generator, other times it is not known but will be completed by the transporter at a later date.

2.2.5 Item G – State Facility's ID

The six-digit identification number assigned by the MDNR HWP to the permitted TSD facility, or "designated facility" as shown on the manifest in Item 9, where the hazardous waste is being sent must be entered here.

2.2.6 Item I – Waste No.

The RCRA waste code(s), (e.g. D001 or F003), for each waste listed under Item 11 must be entered here. If there are no applicable RCRA waste codes (e.g. PCBs are regulated by TSCA and do not have a RCRA waste code), then the word "NONE" must be entered rather than leaving the space blank. If

there is an applicable state waste code, then it must be entered here in addition to any applicable RCRA waste code(s).

NOTE: According to MO State Regulations 10 CSR 25-13.010 (3)(B)(5), "Consignments of PCB material, PCB units or both shall be manifested separately from shipments of hazardous waste even if being conveyed by the same transporter to the same designated facility." In other words, if PCB wastes are being shipped along with some non-PCB wastes (e.g., a drum of waste acid - D002), the PCB wastes and the non-PCB wastes cannot be entered together on the same manifest form. The rationale has something to do with hazardous waste fees and taxes and the procedure that the HWP uses to track PCB wastes.

2.2.7 Item J – Additional Description for Materials Listed Above

Often a hazardous waste will require more than one waste code to be properly characterized. Because there is limited space for entering waste codes under Item I, any additional waste codes that are applicable must be entered within the space provided under Item J. Other additional information that may be required (e.g. other state's requirements) may also be entered here. The four lines "a" "b" "c" and "d" shown on the manifest under Item J correspond to the lines "a" "b" "c" and "d" under Item 11 in the Federal Section of the manifest. For example, if there is a need to enter additional information for a hazardous waste that was listed on line "c" under Item 11, then the additional information for that hazardous waste must be entered on line "c" under Item J.

2.2.8 Item K – Handling Codes

This item is to be completed by the designated TSD facility upon receipt of the waste. The generator should review the final copy of the manifest to ensure that the TSD facility did in fact complete this Item.

3.0 RECORDKEEPING

- 3.1 Once the manifest has been completed at the time of shipment, including signatures from both the generator and the transporter, the generator should retain the goldenrod copy (Part 6 Generator Copy). The designated TSD facility must mail Parts 1 and 2 of the manifest to the generator within 35 days of the date that the shipment left the generator's facility.
- 3.2 The person who signed the manifest for the generator should compare the final copies (i.e. Parts 1 and 2) to the Part 6 copy that was kept on the day of shipment to ensure that no changes were made without prior knowledge. Any discrepancies should be brought to the attention of either the transporter or the designated TSD facility for reconciliation.

- 3.3 Part 1 must be mailed to the HWP. It can either be mailed upon receipt or can be attached to the RCRA Generator Annual Report that must be completed by all generators.
- 3.4 Parts 2 and 6 should be stapled together with the Land Disposal Restriction documents and any other related paperwork that may have been provided by the transporter at the time of shipment (e.g. lab pack contents sheets) and filed in the ESP Hazardous Waste File 4031. Hazardous waste manifests must be retained for at least three years.
- 3.5 The Hazardous Waste Shipment Log, also kept in File 4031 should be updated when a shipment has been made.
- 3.6 A Notification of Regulated Waste Activity form must also be completed and submitted to the HWP when a generator ID number is requested. A copy of the completed Notification of Regulated Waste Activity form shall also be maintained in File 4031.

DEPARTMENT OF NATURAL RESOURCES

HAZARDOUS WASTE MANIFEST

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